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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

RAMON SUERTO, an Individual, and  
GLORIA SUERTO, an Individual,

Plaintiff,

vs.

STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY dba STATE  
FARM an entity licensed to do business in the  
State of Nevada; DOES 1 through 10; and  
ROE CORPORATIONS 1 through 10,  
inclusive,

Defendants.

CASE NO.: 2:25-cv-00318-CDS-EJY

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY (First Request)**

Plaintiffs, RAMON SUERTO and GLORIA SUERTO (“Plaintiffs”), by and through their counsel of record, RIVERA LAW GROUP PROF. LLC, and Defendant, STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY (“Defendant”), by and through its counsel of record, HARPER | SELIM, (collectively, “the Parties”) submit the following Stipulation and proposed Order pursuant to LR 26-3 hereby agreeing to a ninety (90) day continuance (first request) of the current discovery deadlines.

**I. STATEMENT OF DISCOVERY COMPLETED TO DATE**

1. The Parties participated in the Rule 26(f) conference on April 9, 2025.
2. Defendant served its Rule 26(a)(1) Initial Disclosure on April 23, 2025.
3. Plaintiffs served their Rule 26(a)(1) Disclosure on May 2, 2025.

**II. STATEMENT OF DISCOVERY THAT NEEDS TO BE COMPLETED**

1. Written Discovery, as necessary
2. Depositions, as necessary
3. Initial Expert Disclosures
4. Rebuttal Expert Disclosures
5. Expert Witness Depositions, as necessary

**III. REASONS WHY DISCOVERY SHOULD BE EXTENDED**

Plaintiffs and Defendant began diligently pursuing discovery in this matter, including serving their initial disclosures, requesting records, and attempting to coordinate party depositions. However, the Parties concur that additional time is warranted for several reasons.

First, the Parties have commenced discussions regarding alternative means of resolving this matter, including a potential binding arbitration. No agreement has been reached yet, and Plaintiffs and Defendant are still determining parameters and, based on the same, participation.

Second, Defendant is awaiting receipt of executed HIPAA authorizations to obtain records from Plaintiffs' medical providers, as well as other identified entities who may have pertinent information related to the claims and defenses in this matter. Defendant requires additional time to obtain and review these records in preparation for ongoing discovery efforts.

Third, the Parties are discussing depositions, including that of Plaintiffs, Ramon Suerto and Gloria Suerto. Due to counsel's schedules, however, the depositions have not yet been noticed. Accordingly, the Parties require additional time to work with the witnesses' and counsel's schedules so as to obtain the relevant testimony needed in this matter.

Thus, while the Parties have been diligent in moving this case forward, additional time is needed to allow Plaintiffs and Defendant to avoid unnecessary and ongoing litigation fees and costs, including the extreme expense of retention and disclosure of expert witnesses, if they are able to come to an agreement regarding alternative dispute resolution. However, should the Parties not be able to come to an agreement, the additional extension will allow Plaintiffs and Defendant to effectively pursue the discovery outlined above and prepare for a trial on the merits.

**IV. PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY**

It is hereby stipulated that the discovery cutoff deadline be extended for a period of ninety (90) days. The extension is not being sought to harass or delay the proceedings. If approved, the new discovery deadline would be modified as follows:

| <b>Task</b>  | <b>Current Deadline</b> | <b>Proposed Deadline</b>       |
|--|-------------------------|--------------------------------|
| Last day to amend pleadings and add parties                            | Closed                  | Closed                         |
| Last day to disclose initial experts and reports                       | June 26, 2025           | September 25, 2025             |
| Last day to disclose rebuttal experts and reports                      | July 28, 2025           | October 27, 2025 <sup>1</sup>  |
| Discovery cutoff   | August 25, 2025         | November 24, 2025 <sup>2</sup> |
| Last day to file dispositive motions                                   | September 24, 2025      | December 24, 2025              |
| Last day to file Pre-Trial Order (if no dispositive motions are filed) | October 24, 2025        | January 23, 2026               |

DATED this 20<sup>th</sup> day of June 2025.

**RIVERA LAW GROUP PROF. LLC**

*/s/ Tristan F. Rivera*

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DATED this 20<sup>th</sup> day of June 2025.

**HARPER | SELIM**

*/s/ Sabrina G. Wibicki*

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**ORDER**

IT IS SO ORDERED.

  
 UNITED STATES MAGISTRATE JUDGE

Dated: June 20, 2025

<sup>1</sup> This deadline falls on Saturday, October 25, 2025. As a result, this deadline extends to the next court day of Monday, October 27, 2025, by operation of FRCP 6.

<sup>2</sup> This deadline falls on Sunday, November 23, 2025. As a result, this deadline extends to the next court day of Monday, November 24, 2025, by operation of FRCP 6.